

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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NEW YORK HOTEL & MOTEL TRADES
COUNCIL, AFL-CIO,

Petitioner,

-against-

CF 43 HOTEL, LLC, 250 WEST 43 OWNER, LLC,
250 WEST 43 OWNER II LLC, 250 WEST
OWNER III, LLC, d/b/a CARTER HOTEL,

Respondents.
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**NOTICE OF CROSS-
MOTION**

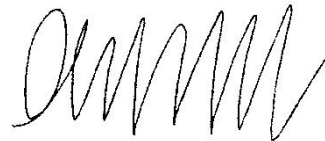
16-cv-5248(LAP)

Please take notice that Respondents cross-move this Court for an Order dismissing the
Petition and awarding such other and further relief as the Court deems proper and just.

Attached hereto are true and accurate copies of the following: Exhibit A – Industry Wide
Agreement (excerpted); Exhibit B – Respondents’ Assumption Agreements; Exhibit C –
Affidavit of Jack Graff; Exhibit D – 4/9/15 Request for Information; Exhibit E – Award No. 37-
2015; Exhibit F – Award No. 38-2015; Exhibit G – Award No. 16-2016.

Dated: June 5, 2017
New York, New York

Respectfully submitted,
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Attorneys for Respondents



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